

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas

FILED

**February 26, 2025**

United States of America

v.

Tedros Zemene

Nathan Ochsner, Clerk of Court

Case No. **4:25-mj-0102***Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 24, 2025 in the county of Fort Bend in the  
Southern District of Texas, the defendant(s) violated:*Code Section*

18 U.S.C. § 2113

18 U.S.C. § 924(c)(1)(A)(iii)

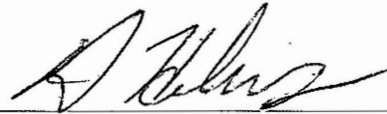
*Offense Description*

Bank Robbery

Discharging a Firearm in Relation to a Crime of Violence

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.*Complainant's signature*

TFO David Helms

*Printed name and title*Attested to by the applicant in accordance with  
the requirements of Fed. R. Crim. P. 4.1 by telephone.Date: 02/26/2025*Judge's signature*City and state: Houston, Texas

Hon. Richard W. Bennett, U.S. Magistrate Judge

*Printed name and title*

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, David Helms, being duly sworn, do hereby depose and state:

1. I am a Sergeant Detective with the Houston Police Department [HPD], duly appointed according to law and acting as such. I have been a Peace Officer with the HPD for over nineteen [19] years and am assigned to the Houston Police Department's Robbery Division as a member of the FBI Houston Division Violent Crime Task Force [VCTF]. The VCTF is comprised of Task Force Officers [TFO's] from the Houston Police Department, the Harris County Sheriff's Office, and Special Agents of the FBI. The VCTF is responsible for the investigation of, among other violent crimes, bank robbery. The facts contained in this affidavit are based upon information provided to me by other law enforcement officers, other witnesses, and my own personal knowledge. Since this affidavit is made for the limited purpose of supporting a Criminal Complaint, I have not set forth each and every fact learned during the course of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crimes charged. Unless otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part only.

2. Affiant was contacted by Sergeant Taylor Surratt (SURRETT) of the Rosenberg Police Department regarding a bank robbery of a Chase bank (an FDIC insured bank) at 23910 Southwest Fwy. Rosenberg TX, 77471, Fort Bend County, within The Southern District of Texas

which occurred on February 24, 2025. The incident was reported to the Rosenberg Police Department under original offense report 25-08003.

3. SURRATT explained to your Affiant that the subject in custody, who was identified as Tedros Zemene (ZEMENE) by his Texas Driver's License, entered the Chase bank at 23910 Southwest Fwy on February 24, 2025 at approximately 1704 hours. SURRATT stated officers were responding to a call slip which stated there was a male outside the Chase bank shooting a gun. SURRATT reiterated to your Affiant that ZEMENE had fired several rounds from his gun in the parking lot before proceeding inside the bank. SURRATT told your Affiant additionally while in the bank ZEMENE shot twice more. SURRATT told your Affiant ZEMENE went to the teller counter with his gun out after already shooting multiple rounds inside the bank in the lobby area. SURRATT stated ZEMENE got \$11,000.00 but it was all recovered upon his arrest along with his pistol, a 9mm Canik model TD9SF, serial #T6472-21 /21251. SURRATT stated ZEMENE's phone was recovered which still had the GPS coordinates open to the bank.

4. Affiant contacted Chase Bank global security and requested the surveillance video. Affiant viewed the video. Affiant observed the following. Affiant observed ZEMENE to enter the bank with a pistol out held in his left hand. Affiant observed all the bank employees to already be on the ground hiding. Affiant observed ZEMENE first speak with some bankers in the lobby area of the bank where he discharges his gun. Affiant observed at least one bullet strike the ground. Affiant believes the pistol was discharged again but could not see in the camera view the bullet strike. ZEMENE then walks over to the teller where the teller turns over United States Currency. ZEMENE leaves the bank.

5. In keeping with the review of surveillance Affiant noted that as soon as ZEMENE made the exit he was met by Rosenberg Police Department. Affiant observed via surveillance as

ZEMENE laid the gun and money on the ground. ZEMENE was then taken into custody. According to the report officers recovered 5 spent casings 3 from outside near the vehicle ZEMENE drove up in on surveillance, a tannish VW sedan, and 2 from inside the bank where ZEMENE shot at the ground. Affiant found ZEMENE was inside the bank from 5:04 pm through 5:11 pm. Approximately 7 minutes.

6. Affiant spoke to victim ARMAS regarding the incident. ARMAS told your Affiant the following. ARMAS stated he is a banker and has worked for Chase for 10 years. ARMAS stated he was helping customers just prior to the incident when he heard gunshots. ARMAS stated his manager screamed there was a man in the parking lot shooting a gun and he is coming into the bank. ARMAS stated he heard 3 shots go off out in the parking lot. ARMAS stated ZEMENE stood outside his cubical and kept saying "give me the money", "let me get that money", "where's the money". ARMAS stated at first he didn't answer he was just too afraid of being shot. ARMAS stated that is when ZEMENE shot the gun toward the ground twice. ARMAS stated he was laying on the ground and got increasingly scared. ARMAS stated he told ZEMENE that he would walk him over to the teller booth. ARMAS stated the tellers were all hiding fearing their safety. ARMAS stated he called out to tellers and no one responded. ARMAS stated the whole time ZEMENE is demanding money. ARMAS stated finally his co-worker came out and he instructed her to release funds. ARMAS stated his co-worker handed the money to ARMAS and ARMAS gave it to ZEMENE. Each time ARMAS stated ZEMENE said we will be here all day that's not enough I need more. ARMAS stated ZEMENE did this a total of 3 times before collecting a total of \$11,000.00. ARMAS stated ZEMENE walked out and ARMAS observed Rosenberg Police Department taking ZEMENE into custody outside the entrance to the bank.

7. Based on the foregoing, your Affiant believes there is probable cause to believe that on February 24, 2025, Tedros Zemene committed a bank robbery and discharged a firearm taking \$11,0000.00 in currency from Chase bank at 23910 Southwest Fwy, the location being within the Southern District of Texas, in violation of Title 18, United States Code, Section 2113 and 924(c).



TFO David Helms, Houston Police Department/ FBI VCTF

Subscribed and Sworn to me by telephone on February 26, 2025, and I find probable cause.



HON. RICHARD W BENNETT  
UNITED STATES MAGISTRATE JUDGE